

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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FRANCO P. CERABONA, MD and :  
ANDREW MEROLA, MD, : 19-CV-03119 (VSB)  
:  
Plaintiffs, :  
:  
v. :  
:  
MEDLINK SERVICES, INC., MEDLINK :  
PARTNERS, LLC, AMRISH PATEL, MALA :  
PATEL, and HEMANSHU PATEL, :  
:  
Defendants. :  
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**AGREEMENT TO BE BOUND BY  
STIPULATED PROTECTIVE ORDER**

1. I have reviewed, understand and agree to be bound by the terms of the Stipulated Protective Order entered by the United States District Court for the Southern District of New York on \_\_\_\_\_, 2019, in the above-captioned action (the “Protective Order”).
2. I understand that my execution of this Agreement indicates my agreement to be bound by the Protective Order and is a prerequisite to my access or review of any information or documents designated as Confidential Information pursuant to the Protective Order.
3. I will access and review Confidential Information that may be provided to me solely for the purpose of my role in assisting with the prosecuting or defending of the above-captioned action and for no other purpose whatsoever. I further agree that I will not disclose any Confidential Information to any person except as allowed by the terms of the Protective Order.
4. I will only make such copies of or notes concerning Confidential Information as are necessary to enable me to render the assistance required in connection with this action. Upon the final determination of this action, I shall promptly and securely destroy or delete all Confidential Information provided to me as well as any notes or derivations thereof. I

understand that my obligation to honor the confidentiality of such material will continue even after this action concludes.

5. I understand that certain Confidential Information may be subject to state and federal statutory and regulatory privacy and security standards, including, but not limited to, the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), the Health Information Technology for Economic and Clinical Health Act of 2009 (the “HITECH Act”), and regulations adopted under the U.S. Department of Health and Human Services, 45 C.F.R. Parts 160, 162, and 164 (the “HIPAA Rules”). All Confidential Information disclosed by any party or third party to this action shall be treated in accordance with those standards, if applicable. Capitalized terms used, but not otherwise defined in this agreement, shall have the same meanings as those terms in HIPAA Rules.

6. I understand that failure to comply with the terms of the Protective Order may be punishable by contempt of court and may result in civil liability to any party or person damaged thereby. I agree to be fully bound by the Protective Order, and I hereby submit to the jurisdiction of the United States District Court for the Southern District of New York (without any time limit) for the purpose of enforcing this Protective Order.

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_